



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 22, 2019

Kaisar Ahmed  
610 Golden West Drive  
Redlands, CA 92373

Re: ADR 884  
Kaisar Ahmed for US Congress 2016 and Kaisar Ahmed, Treasurer

Dear Kaisar Ahmed:

Enclosed is the signed copy of the Negotiated Settlement resolving the above-shown matter. The Negotiated Settlement was approved by the Commission on February 14, 2019 – the effective date of the agreement.

Note the specific time frames for compliance detailed in the agreement. Please forward to this office, a statement confirming Respondent's compliance with each term. The letter should note the dates on which Respondents satisfied each of the terms and contain the ADR case number. For your convenience, a compliance chart is attached.

As you are aware, the Negotiated Settlement will be made part of the record that is released to the public. The Commission will also place on the record copies of the complaint/referral, correspondence exchanged between your office and this office prior to our negotiations, and reports prepared for the Commission by this office to assist in its consideration of this matter. The Commission is obliged by Federal statute to place on the public record documents in closed enforcement and alternative dispute resolution cases; accordingly, copies of documents relative to this matter will be forwarded shortly to the FEC's Public Records Office.

This agreement resolves this matter. I appreciate your assistance in effectively resolving this matter and bringing the case to a mutually acceptable conclusion.

Sincerely,

*Krista J. Roche*

Krista J. Roche  
Director

Alternative Dispute Resolution Office

Enc: Compliance Chart  
Negotiated Settlement

### ADR 884 Compliance Chart

Type	Due Date
Participate in a one-on-one training regarding best practices, disclaimers, and reporting requirements scheduled with the Information Division and/or Reports Analysis Division (RAD).	3/14/19
File reports disclosing all campaign activity for the 2018 election cycle.	4/15/19
Continue to file disclosure reports until a termination report is approved	



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Case Number: ADR 884

Source: MUR 7387

Case Name: Kaisar Ahmed for US Congress 2016

### NEGOTIATED SETTLEMENT

This matter was initiated by a signed, sworn, and notarized complaint filed by Howard Morris. Following review of the matter, and in an effort to promote compliance with the Federal Election Campaign Act of 1971, as amended, (FECA) and resolve this matter, the Federal Election Commission (Commission) entered into negotiations with Kaisar Ahmed representing Kaisar Ahmed for US Congress 2016 and himself, in his official capacity as Treasurer (the Committee or Respondents). It is understood that this agreement will have no precedential value relative to any other matters coming before the Commission.

Negotiations between the Commission and Respondents addressed the issues raised in the Complaint. The parties agree to resolve the matter according to the following terms:

1. The Commission entered into this agreement as part of its responsibility for administering the FECA, and in an effort to promote compliance on the part of Respondents. The Commission's use of alternative dispute resolution procedures (ADR) is guided by "The Administrative Dispute Resolution Act of 1996," 5 U.S.C. § 572 and is an extension of 52 U.S.C. § 30109.
2. Respondents voluntarily enter into this agreement with the Commission.
3. On May 18, 2018, Howard Morris filed a Complaint alleging that Respondents failed to properly file reports and disclose financial activity during the 2016<sup>1</sup> and 2018 election cycles while Kaisar Ahmed was a candidate for the House of Representatives in California's District 31. The Complaint alleges that after Mr. Ahmed filed his Statement of Candidacy with the Commission on January 25, 2018, he failed to register a principal campaign committee and report any financial activity to the Commission. The Complainant states that based on information released by the San Bernadino County Elections Office, the estimated cost for a District 31 House of Representatives candidate to provide a candidate statement appearing in the Voter Information Guide is \$11,376. As Mr. Ahmed's statement appeared in the guide, the Complainant states that he would have triggered the requirements to file reports with the Commission. Additionally, the Complainant states that he "received multiple flyers that appear to be from Mr. Ahmed, but that do not disclose the entity that paid for them."

*Kaisar Ahmed, 12/17/18*

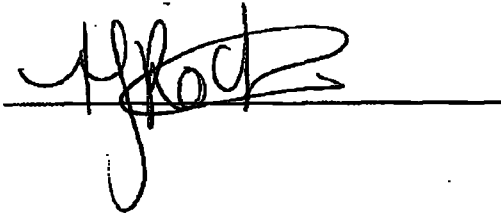
<sup>1</sup> Respondents' activity in the 2016 election cycle was the subject of ADR 827, the settlement for which was approved by the Commission on October 30, 2017. The Reports Analysis Division provided training and continues to assist Mr. Ahmed with filing reports pursuant to that settlement.

- CONFIDENTIAL
4. In a response dated July 11, 2018, the Respondents indicate that they "may not have been successful in closing all books for 2016 election cycle," and that they "will make every effort to comply with the election laws."
  5. Commission records show that Respondents filed reports to disclose some activity for the 2016 election cycle, but have not filed any reports for the 2018 election cycle. In addition, Mr. Ahmed's Statement of Candidacy discloses Kaisar Ahmed for US Congress as his principal campaign committee for the 2018 election cycle. Lastly, one flyer submitted with the Complaint appears to lack the required disclaimer, while it is unclear whether a second flyer submitted with the Complaint was produced by the Respondents.
  6. Treasurers of political committees are required to report all financial activity, including all receipts, disbursements, and debts, pursuant to the FECA. 52 U.S.C. §§ 30104(b)(2), (4), and (8), 11 C.F.R. §§ 104.3(a), (b), and (d).
  7. All public communications for which a political committee makes a disbursement must include a disclaimer. If a communication is paid for and authorized by a candidate, an authorized committee of a candidate, or an agent of either of the foregoing, the disclaimer must clearly state that the communication has been paid for by the authorized political committee. 52 U.S.C. § 30120, 11 C.F.R. § 110.11.
  8. Respondents, in an effort to avoid similar errors in the future, agree to: (a) participate in a one-on-one training regarding best practices, disclaimers, and reporting requirements scheduled with the Information Division and/or Reports Analysis Division (RAD) within thirty (30) days of the effective date of this agreement; and (b) file reports disclosing all campaign activity for the 2018 election cycle within sixty (60) days of the effective date of this agreement and continue to file disclosure reports until a termination report is approved.
  9. Respondents agree that all information provided to resolve this matter is true and accurate to the best of their knowledge and that they sign this agreement under penalty of perjury pursuant to 28 U.S.C. § 1746.
  10. The parties agree that if Respondents fail to comply with the terms of this settlement, the Commission may undertake civil action in the U.S. District Court for the District of Columbia to secure compliance.
  11. This agreement shall become effective on the date signed by all parties and approved by the Commission. Respondents shall comply with the terms of this agreement as set out in paragraph 7 above, and shall certify compliance with the above settlement terms in writing to the Alternative Dispute Resolution Office on or before the date each term becomes due.
  12. This Negotiated Settlement constitutes the entire agreement between the parties on ADR 884 (MUR 7387), and resolves those issues identified in paragraph 3 above. No other statement, promise or agreement, either written or oral, made by either party, not included herein, shall be enforceable.


Kaisar Ahmed, 12/17/18

FOR THE COMMISSION:

Krista J. Roche, Director  
Alternative Dispute Resolution Office



2/14/19  
Date Signed

  
Kaisar Ahmed  
Representing Kaisar Ahmed for US Congress 2016  
and Kaisar Ahmed, Treasurer

12-17-18  
Date Signed

10-10-08-11-08-10